

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware
corporation; and VERA BRADLEY DESIGNS,
INC. an Indiana corporation,

Plaintiffs,

v.

WEI "TONY" JIANG, et al.,

Defendants.

No. 2:18-cv-00356-RSL

STIPULATION AND
~~PROPOSED~~ ORDER
PERMITTING CERTAIN
DEPOSITIONS AFTER
DISCOVERY CUTOFF

Noted for Consideration: January
10, 2018

Plaintiffs Amazon.com, Inc. ("Amazon") and Vera Bradley Designs, Inc. ("Vera Bradley"), and Defendants Daixiuzhen Diaxuzhen, Zhu Young Cheng, Zhenyao Yang, Yoko Nakamura, Jun Fan, Akira Nakamura, Lili Nelson, Wenjun Song, and Wenjuan Liu jointly present the following stipulation and request that the Court enter the proposed subjoined order.

STIPULATION

1. On May 10, 2018, the Court entered a minute order setting the trial dates and related deadlines in this case. In that order, the Court required discovery to be completed by February 3, 2019.

STIPULATION AND ~~PROPOSED~~ ORDER PERMITTING DEPOSITIONS
AFTER DISCOVERY CUTOFF
(No. 2:18-cv-00356-RSL) - 1

4830-3468-2757v.1 0051461-001944

Davis Wright Tremaine LLP
LAW OFFICES
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
206.622.3150 main · 206.757.7700 fax

2. Due to scheduling constraints of counsel and various party witnesses, and due to the fact that several parties reside or are currently located in China, the parties have agreed to take certain depositions after the February 3 discovery cutoff, namely:


- a. Amazon.com, Inc's Rule 30(b)(6) deposition will be taken the week of February 4, 2018;
- b. Vera Bradley Designs LLC's Rule 30(b)(6) deposition will be taken the week of February 11, 2018;
- c. Daixiuzhen Diaxuzhen and Wenjuan Liu's depositions will be taken between February 18 and 29, 2018, if necessary.

3. Accordingly, the parties have agreed—and respectfully request the Court's leave—to take these depositions after the February 3, 2018 discovery cutoff. This stipulation will not require the amendment or postponement of any other case deadlines, including the dispositive motions deadline or the trial date.

ORDER

IT IS SO ORDERED.

DATED this 11th day of January, 2019.


The Honorable Robert S. Lasnik
United States District Judge

STIPULATION AND ~~PROPOSED~~ ORDER PERMITTING DEPOSITIONS
AFTER DISCOVERY CUTOFF
(No. 2:18-cv-00356-RSL) - 2

4830-3468-2757v.1 0051461-001944

Davis Wright Tremaine LLP
LAW OFFICES
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
206.622.3150 main • 206.757.7700 fax

1 Stipulated and jointly presented by:

3 DAVIS WRIGHT TREMAINE LLP
4 *Attorneys for Plaintiffs Amazon.com, Inc. and*
5 *Vera Bradley Designs, Inc.*

6 By /s/ James Harlan Corning
7 Bonnie E. MacNaughton, WSBA #36110
8 James Harlan Corning, WSBA #45177
9 1201 Third Avenue, Suite 2200
10 Seattle, WA 98101-3045
11 Tel: (206) 622-3150
12 Fax: (206) 757-7700
13 Email: bonniemacnaughton@dwt.com
14 jamescorning@dwt.com

10 CLOUTIER ORTEGA PLLC
11 *Attorneys for Defendants Yoko Nakamura &*
12 *Zhenyao Yang*

13 By /s/ Priya Sinha Cloutier *
14 Priya Sinha Cloutier, WSBA No. 37407
15 1700 Westlake Ave. N., Suite 200
16 Seattle, Washington 98109
17 Tel: (206) 319-9001
18 Fax: (206) 693-4422
19 Email: priya@cotechlaw.com

JOHNSON JACOBOWITZ & ARNOLD PC
11 *Attorneys for Defendants Daixiuzhen*
12 *Diazuzhen, Zhu Young Cheng, Jun Fan, Akira*
13 *Nakamura, Lili Nelson, Wunjun Song, &*
14 *Wenjuan Liu*

15 By /s/ Nathan J. Arnold *
16 Nathan J. Arnold, WSBA No. 45356
17 2701 First Ave, Suite 340
18 Seattle, WA 98121
19 Tel: (206) 866-3230
20 Email: nathan@jjjalaw.com

25 * Electronic signatures authorized via e-mail on 1/10/19.

27 STIPULATION AND ~~PROPOSED~~ ORDER PERMITTING DEPOSITIONS
AFTER DISCOVERY CUTOFF
(No. 2:18-cv-00356-RSL) - 3

4830-3468-2757v.1 0051461-001944

Davis Wright Tremaine LLP
LAW OFFICES
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
206.622.3150 main · 206.757.7700 fax